



**Technology Sciences Group Inc.**

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**Submitted Electronically**

Demson Fuller  
Antimicrobial Division (7504P)  
Office of Pesticide Products  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

October 22, 2013

**Re: A540 New End Use Product**  
**Company Name:** Aquilabs US, LLC  
**Product Name:** *hychloHSD*  
**EPA Reg. No.:** 90132-TBD

Dear Demson,

Technology Sciences Group, Inc., on behalf of Aquilabs US, LLC (here in Aquilabs) is submitting the enclosed application to register *hychloHSD*. This product contains hypochlorous acid (0.33%) and is intended for use as a hard surface, food-contact, cleaner, sanitizer, and disinfectant for commercial, institutional, and residential use.

The following data are submitted in support of this application:

1. Product Chemistry Group A and B (830.1550 – 830.1900 and 830.6302 – 830.7300); MRID 49228901 and 49228902.
2. Acute Toxicity Data (870.1100 – 2600); MRID 49228903. Please note that the product name include in the data volume is *Acido Hipocloroso*. This product was initially developed in Columbia and the data was generated under a different name. *hychloHSD* and *Acido Hipocloroso* are the same product. Also note that a signed copy of the English translation of the GLP statement page is not available. However, included in the data volume is the signed Spanish page accompanying the unsigned English translation.
3. Efficacy studies are submitted for the following organisms: *Aspergillus brasiliensis* (ATCC 16404), *Candida albians* (ATCC 10231), *Campylobacter jejuni* (ATCC 29428), *Enterobacter aerogenes* (ATCC 13048), *Escherichia coli* – NDM-1 positive, Influenza A (H1N1) Virus, *Listeria monocytogenes* (ATCC 19117), Methicillin Resistant

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**Washington, D.C.**

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*Staphylococcus aureus* MRSA (ATCC 33592), *Pseudomonas aeruginosa* (ATCC 15442), *Salmonella enterica* (ATCC 10708), *Staphylococcus aureus* (ATCC 6538), Vancomycin Resistant *Enterococcus faecalis* – VRE (ATCC 51575); MRID 49228904-49228913.

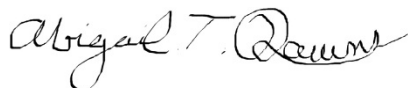
These data support the disinfection and sanitization claims this product makes. The product has proven effective against both gram-positive and gram-negative bacteria using the AOAC Use-Dilution Method and is permitted to make an unqualified “germ” claim as it is effective against one pathogenic fungi and one enveloped and one non-enveloped virus.

You will find the following to support the application for *hychloHSD*:

1. 8570-1, Application Form;
2. 8570-4, Confidential Statement of Formula (CSF);
3. 8570-34, Certification with respect to data citation ;
4. 8570-35, Data Matrices, confidential and releasable versions;
5. Data volumes, MRID 49228901-49228913;
6. Five copies of the proposed label;
7. PRIA pre-payment confirmation, Pay.gov tracking ID: 25CRAAQ2; Agency tracking ID: 74519489348.
8. Voluntary Small Business Certification Application.

Please do not hesitate to contact me with any questions at (202) 828-8992 or via e-mail: [adowns@tsgusa.com](mailto:adowns@tsgusa.com).

Sincerely,



Abigail T. Downs  
Regulatory Consultant to  
Aquilabs US, LLC